

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS
WESTERN DIVISION

ELIZABETH STEFFENBERG,

Plaintiff,

v.

T. GENE GILMAN, STEVEN GILMAN, THE GILMAN INSURANCE AGENCY, INC., DAVID M. SCOLL, ARBOR SECURITIES, LTD., ALLIANCE INVESTMENT MANAGEMENT, COMMONWEALTH FINANCIAL HOLDINGS INC., FINANCIAL LINKS, INC., T. GILMAN & CO., LTD., FIRST ALLIED SECURITIES, INC., PENSON FINANCIAL SERVICES, INC., AVIVA USA CORPORATION, TRADETEK, LTD. and TRADETEK, LLC,

Defendants.

CIVIL ACTION NO. 04-40113-FDS

ASSENTED TO MOTION TO EXTEND TIME TO OPPOSE PLAINTIFF'S MOTION FOR RECONSIDERATION

NOW comes the Defendant, David M. Scoll (hereinafter "Scoll"), and hereby moves, pursuant to Local Rule 7.1 of the Local Rules of the United States District Court for the District of Massachusetts (hereinafter "Local Rules"), for an extension of time to February 23, 2005 within which to oppose the Plaintiff's recently filed Motion for Reconsideration. See Pl.'s Mot. for Reconsid. of Pl. Elizabeth R. Steffenberg of the Order Denying Her Mot. to Compel Responses of David M. Scoll to Pl.'s First Req. for Prod. of Docs. dated Feb. 2, 2005 (hereinafter "Motion for Reconsideration").

In support hereof, Scoll states:

1. The Plaintiff filed her Motion for Reconsideration on February 2, 2005.

2. According to Rule 7.1(B)(2) a party opposing a Motion must file an opposition within fourteen (14) days after service. See L.R. 7.1(B)(2). Thus, Scoll's Opposition is due on or about February 16, 2005.
3. Due to other work-related obligations, counsel for Scoll has not been able to prepare, serve and file his opposition to the Plaintiff's Motion within the time required by the Local Rules.
4. As a result, Scoll seeks an extension of time to February 23, 2005 within which to file and serve an opposition to the Plaintiff's Motion for Reconsideration.
5. The Plaintiff assents to this request for additional time.

WHEREFORE, Scoll moves for an extension of time to February 23, 2005 within which to respond to the Plaintiff's Motion for Reconsideration.

Assented to by:

Respectfully submitted,
DAVID M. SCOLL
By his Attorneys,

ELIZABETH STEFFENBERG
By her Attorneys

/s/ Sara Discepolo

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/s/ Christine Collins (SD)

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Dated: February 16, 2005

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T. GENE GILMAN, STEVEN GILMAN, THE GILMAN INSURANCE AGENCY, INC., DAVID M. SCOLL, ARBOR SECURITIES, LTD., ALLIANCE INVESTMENT MANAGEMENT, COMMONWEALTH FINANCIAL HOLDINGS INC., FINANCIAL LINKS, INC., T. GILMAN & CO., LTD., FIRST ALLIED SECURITIES, INC., PENSON FINANCIAL SERVICES, INC., AVIVA USA CORPORATION, TRADETEK, LTD. and TRADETEK, LLC,

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CERTIFICATE OF SERVICE

I, Sara Discepolo, hereby certify that on February 16, 2005, I electronically filed the foregoing *Assented to Motion to Extend Time to Oppose Plaintiff's Motion for Reconsideration* and caused to be served a courtesy copy of the same to all parties/counsel of record by mailing the same via first class mail, postage prepaid, to the following parties:

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/s/ Sara Discepolo
Sara Discepolo